Process Mapping

When a process is first established a process map should be documented. If Business Analysts were involved in the underlying project, then you should have process maps documented.

 Mapping processes has a number of benefits in terms of understanding the process and aiding new employees to get up and running efficiently but in terms of data protection process mapping has the following benefits:

1. Provides a simple visual representation of the processing activity.
2. Aids the reader to understand how Personal Data enters the process
3. Aids the reader to identity who interacts with the Personal Data
4. Aids the reader to identify controls and control gaps
5. Aids the reader to understand how Personal Data leaves the process
6. Gives internal Audit a framework to conduct their testing activities
7. Demonstrates to the Supervisory Authority a company is managing its Data Protection Risk

Business Process Model and Notation as a concept was created to enable Business Analysts to document processes in a manner that supported interoperability between different internal departments within the same company and different companies working together on different aspects of the same process or different processes which interact with each other. EPMN provides a very simple yet powerful notation which encompasses the following concept:

1. Flow Objects - what causes data to move from one process to another?
     a. Events
     b. Activities
     c. Gateways

2. Data -what data is used within the process?
     a. Objects
     b. Inputs
     c. Outputs
     d. Stores

3. Connecting Objects - how does data move around the process?
     a. Sequence Flows
     b. Message Flows
     d. Data Associations

4. Swim lanes - who are the processors?
     a. Pools
     b. Lanes

5. Artefacts what additional information would make the process better understood?
     a. Group
     b. Text Annotation

With just the above components any manual or automated process can be mapped out.

Example - Candidate Filtering Process
The process actors are identified by their pools and swim lanes The HR Administrator, and Hiring Manager are in separate swim lanes but a single pool to denote they are part of the same organisation. The Candidate is in a separated swim lane because at this stage the candidates are not part of the organisation. The process starts when candidates initiate the Send CV process and uploads a CV to a Data store, the Human Resources

Information System (HRIS) owned by the HR Administrator. Be aware that within most process modelling methodologies, processes are described using verb-noun pairs (e.g. Send CV).

Whenever data transfers between different pools this is depicted by a dotted line known as a 'message flow'. Once the CV hits the hiring organisation, a timer ticks down until the application deadline is reached. The HR Administrator carries out the first CV filter. This is where the process arrives at a logic gate, an exclusive gateway.

An exclusive gateway requires only one path can be taken. Within BPMN there are a number of other logic gates {e.g. inclusive, parallel, event and complex). In this process, the gateway requires the HR admin filter candidate CVs into yes and no piles and then forwards the yes pile on to the hiring manager. After the second filtering process, a second exclusive gateway occurs.

This time, the hiring manager filters the CVs into new yes and no piles. Those CVs in the yes pile are then contacted by HR to arrange an interview. Those candidates who aren't successful at either stage are then informed their application has been unsuccessful. In parallel with the candidate filtering process, there is also a trigger which recurs every 90 days to remove candidates details from the HRIS is they have been unsuccessful.

Practitioners can use this type of process map to identify potential data protection issues e.g. does the candidate receive privacy information when a CV is submitted? What fields are collected from the candidate when they register? Is there any automatic processing within the HRIS before the data is presented to the HR Administrator or the Hiring Manager? Is the candidate informed they could have their data removed from the HRIS earlier than 90 days and how they would go about making such a request...and so on.